

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

PAMELA PRUNEAU,

Plaintiff,

v.

MARRIOTT HOTEL SERVICES, INC. and
MARRIOTT INTERNATIONAL
ADMINISTRATIVE SERVICES, INC.,

Defendants.

Case No. 2:22-cv-00713-BJR

**STIPULATED MOTION AND ORDER
TO EXTEND PRETRIAL DEADLINES**

Plaintiff Pamela Pruneau and Defendants Marriott Hotel Services, Inc. et al., by and through their respective counsel, hereby stipulate to and jointly request pursuant to Federal Rule of Civil Procedure (“FRCP”) 6(b) and LCR 16(b)(6) for a continuance of select pre-trial deadlines. Here, good cause exists to extend select pre-trial deadlines by ninety (90) days. The parties do not request a change in trial date. In support of this stipulation, the parties state as follows:

1. Trial in this matter is currently set for September 5, 2023. ECF No. 9. Reports from expert witnesses under FRCP 26(a)(2) were due on February 7, 2023. ECF No. 9. Discovery is set to close on March 9, 2023. ECF No. 9. The dispositive motion filing deadline is April 10, 2023. ECF No. 9.

2. On February 7, 2023, Thomas P. Holt withdrew as counsel for Defendants. On February 7, 2023, Alyesha A. Dotson appeared as counsel for Defendants.

3. The parties have diligently conferred on outstanding discovery issues, and they

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foresee additional time needed to complete depositions and exchange additional written discovery and accompanying productions. The parties believe continuing recent and pending pre-trial deadlines in the case schedule by 90 days will allow the parties to complete discovery and improve the likelihood that this matter may be resolved through alternative dispute resolution discussions.

4. In seeking this extension, the Parties propose amending the following deadlines by 90 days:

- Disclosure of Expert Testimony under FRCP 26(a)(2): **May 8, 2023**
- Discovery Cutoff: **June 7, 2023**
- Dispositive Motion Filing Deadline: **July 10, 2023**

5. The Court may extend the case schedule where good cause exists. Fed. R. Civ. P. 16(b)(4); LCR 16(b)(5); *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604 (9th Cir. 1992). Good cause exists for this extension, and a continuance will afford the parties extra time to exchange discovery and complete witness depositions prior to dispositive motion and explore alternative dispute resolution. Counsel for both parties have discussed this extension with their respective clients and the parties agree with this extension.

Dated: February 8, 2023

/s/ Patrick B. Reddy

(via email authorization)

Patrick B. Reddy, WSBA #34092

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MARRIOTT HOTEL SERVICES, INC. ET AL.

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

IT IS FURTHER ORDERED that pursuant to Fed. R. Evid. 502(d), the production of any documents in this proceeding shall not, for the purposes of this proceeding or any other federal or state proceeding, constitute a waiver by the producing party of any privilege applicable to those documents, including the attorney-client privilege, attorney work-product protection, or any other privilege or protection recognized by law.

DATED: February 14, 2023



The Honorable Barbara J. Rothstein
United States District Judge